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8 ADOBE SYSTEMS INCORPORATED  
and ELECTRONIC ARTS INC.

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13 **DIGITAL REG OF TEXAS, LLC,**

14 **Plaintiff,**

15 **vs.**

16 **ADOBE SYSTEMS INCORPORATED, et al.,**

17 **Defendants.**

Civil Case No. 12-CV-01971 CW (KAW)

**DECLARATION OF ERIC WILDE IN  
SUPPORT OF DEFENDANTS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT OF  
NONINFRINGEMENT BASED ON  
DIGITAL REG'S LICENSE TO  
MICROSOFT**

1 I, Eric Wilde, declare:

2 1. I am an employee of Defendant Adobe Systems Incorporated ("Adobe")  
3 in the above-captioned matter. I submit this declaration based on personal knowledge and  
4 following a reasonable investigation. If called upon as a witness, I could competently testify to  
5 the truth of each statement herein.

6 2. I have worked for Adobe for 20 years, and my current job title is Senior  
7 Engineering Manager. During my time at Adobe, I have worked extensively on projects related  
8 to Adobe's volume licensing efforts.

9 3. As a result of my work, I am familiar with Adobe's Licensing Website  
10 (LWS), which is a web-based tool that provides certain information, such as product serial  
11 numbers, number of downloads, and purchase histories, and functionality to Adobe's volume  
12 licensing customers.

13 4. Currently, Adobe only supports volume licensing for customers using  
14 certain versions of either Microsoft Windows or Macintosh operating systems.

15 5. In some instances, Adobe volume licensing customers may be able to  
16 download previously purchased software from LWS. In such a scenario, the entire process,  
17 from providing the information to verify access to the particular software to downloading it  
18 from LWS, is coordinated by the user's browser and operating system. For example, if the  
19 LWS user is seeking to download software to a machine running Windows, a standard  
20 Windows operating system dialog box will prompt the user to save the software on their  
21 machine. Before the user can download the software, he/she must first choose an appropriate  
22 folder to save the software within the Windows architecture, and the software bits will be  
23 downloaded to their machine from Akamai storage location in a process that is controlled by  
24 Windows Application Programming Interfaces (APIs). Without the Windows APIs, or the  
25 underlying Windows architecture and operation, it would not be possible to download  
26 previously purchased software from LWS in such a scenario.

27 I declare under the penalty of perjury under the laws of the United States of  
28 America that the foregoing is true and correct.



Executed on June 18, 2013, at San Jose, California.

  
Eric Wilde

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